

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



**APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL**

IN RE AIR CARGO SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775
Docket Number

SUBMITTED BY: Plaintiff X Defendant DOJ

Name: Robert N. Kaplan

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INDICATE UPON THE PUBLIC DOCKET SHEET: YES X NO

If yes, state description of document to be entered on docket sheet:

FILED UNDER SEAL:

Plaintiffs' un-redacted letter motion for an order directing Nippon Cargo Airlines Co., Ltd. ("NCA") to produce a prepared and educated Rule 30(b)(6) witness at its expense in the United States; and Exhibits 3-8 thereto.

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: 1:06-md-01775-JG-VVP
Docket Entry No. 599

Judge/Magistrate Judge: Viktor V. Pohorelsky

Date Entered: 09/21/2007

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: _____, NEW YORK

U.S. DISTRICT JUDGE/U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE _____
DATE _____

MANDATORY CERTIFICATION OF SERVICE:

A.) X A copy of this application either has been or will be promptly served upon all parties to this action, B.) Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: ; or C.) This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

08/25/2011
DATE

/s/ Robert N. Kaplan
SIGNATURE